

## **REMARKS**

Claims 1-6, 8, 9, and 11-21 are pending in the application. The Examiner rejected claims 1-6, 8, 9, and 11-21 in the above mentioned Office Action.

### **Claim Rejections Under 35 U.S.C. §112**

The Examiner rejected claims 1-6, 8, 9, and 11-21 under 35 U.S.C. §112, first paragraph, as failing to comply with the written description requirement. The Examiner specifically objects to the term “a movement of one substrate region does not translate to an adjacent substrate region.” Applicant respectfully disagrees. A possible movement of a substrate region and its effect on adjacent substrate regions is disclosed in the background section and the description of the preferred embodiment of the present application.. For example, paragraphs [0034] and [0035] on page 8 of the specification explains this effect. These paragraphs disclose that thermally induced stress results in a movement, namely the a substrate region moves relative to another one. See paragraph [0035], page 8, line 28 to page 9, line 3, and page 8, line 20-22. Furthermore, page 8, line 28 to page 9, line 3, clearly explains that a propagation of a movement, namely in form of tilting, can be avoided. A person skilled in the art will clearly understand that the meaning of “a propagation of a movement” is equivalent to the translation of a movement of one substrate region into another adjacent substrate region. The present application address a person skilled in the art. Such a person, namely an engineer in the power semiconductor field, will without doubt find that the present specification inherently discloses, even though not literally, the phrase “a movement of one substrate region does not translate to an adjacent substrate region.”

### **Claim Rejections Under 35 U.S.C. §102**

Claims 1 and 14 have been rejected under 35 U.S.C. §102(b) as being anticipated by Lin. Applicant respectfully disagrees. Independent claims 1 and 14 include limitations neither disclosed nor suggested by Lin.

Claims 1 and 14 include the term “connecting regions.” While there is no unambiguous clear ordinary and plain meaning of this term, the term is clearly defined in the present specification. For example, paragraph [0035] explains this term as being an area between two substrate regions designed to allow a relative movement of one substrate region with respect to an adjacent substrate region. As an example of such a connecting region, slotted recesses are shown in the figures. Such a definition of a term is proper because the Applicant can be his own lexicographer. The Examiner, however, cited prior art which does not show such connecting areas having the required function. Lin merely discloses through hole vias. A through hole via is a means for electrically connecting printed circuit board tracks on opposite sides of a substrate. Lin does neither disclose or suggest that a through hole via avoids mechanical stress between adjacent substrate region induced by heat. Thus, a person skilled in the art faced with the problem of thermal deformation of a high power semiconductor module would never consider Lin because Lin neither addresses this problem nor discloses any solution to this problem. Moreover, as stated above, the term “connecting regions” as defined in the present application does not encompass electrical connection means.

### **Claim Rejections Under 35 U.S.C. §103**

The Examiner rejected all dependent claims as being unpatentable over Lin in view of Kapnias, in view of Lin, Kapnias, and Schrock, or in view of Lin, and Higgins or Halley. Applicant respectfully disagrees.

The dependent claims include all the limitations of the respective independent claims. Thus, these claims are at least patentable to the extent of the independent claims to which they refer. However, for example, Schrock does not teach that a substrate carrying a plurality of devices comprises slotted recesses as connecting regions. Schrock clearly teaches a completely different subject matter. The substrate shown in Schrock is not a semiconductor module but merely a means for helping mass manufacturing of semiconductor devices. Thus, the substrate shown in Schrock are a plurality of single substrates supported by side rails. The slots shown in Schrock are merely gaps between different devices and have no particular function. The devices are later separated to single devices as shown in Fig. 5f.

### **SUMMARY**

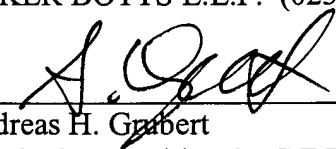
In light of the above remarks, reconsideration and withdrawal of the outstanding rejection is respectfully requested. Early notice of the allowance is earnestly solicited. Should the Examiner have any questions, comments or suggestions in furtherance of the prosecution of this application, the Examiner is invited to contact the agent of record by telephone or facsimile. If there are any fees due with the filing of this Response, including any fees for an extension of time, Applicants respectfully Petition the Commissioner for such an extension and direct that any

and all fees be charged to Baker Botts L.L.P., Deposit Account No. 02-0383, (*formerly Baker & Botts, L.L.P.*) Order Number 074313.0105.

Respectfully submitted,

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